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COMDTINST M12510.6C OCT 17 1995

COMMANDANT INSTRUCTION M12510.6C

Subj: POSITION CLASSIFICATION MANUAL

- 1. <u>PURPOSE</u>. This manual provides guidance for personnelists, managers, and employees on classifying General Schedule (GS) and Federal Wage System (FWS) positions.
- 2. <u>ACTION</u>. Area and District commanders, Commanders Maintenance and Logistics commands, Commanding Officers of Headquarters units, and Chiefs of offices and special staff divisions at Headquarters shall comply with this Instruction's provisions.
- 3. <u>DIRECTIVES AFFECTED</u>. COMDTINST M12510.6B is cancelled.
- 4. <u>BACKGROUND</u>. Based on National Performance Review recommendations, this manual decreases the administrative burdens of classifying jobs by revising required formats for position descriptions and evaluation statements and abolishes unnecessary requirements. This manual retains those legal responsibilities outlined in U.S. Title 5, e.g., (delegating classification authorities and appeal procedures) and updates career ladders for civilian personnel.

/s/ W.C. Donnell Chief, Office of Personnel and Training

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CHAPTER 1. GENERAL PROVISIONS

- A. <u>Coverage</u>. This manual includes all General Schedule (GS) and Federal Wage System (FWS) positions.
 - 1. <u>Objectives</u>. The primary objectives of the Federal classification plan are:
 - a. To identify positions with appropriate qualifying standards;
 - b. To ensure equal pay for substantially equal work; and
 - c. To ensure variations in basic pay ranges for different employees are proportional to substantial differences in the difficulty, responsibility, and qualifications of the work performed.
 - 2. <u>Exceptions</u>. Currently, continuing exceptions are Academy Faculty and Executive Level positions, ferryboat officers and crews, lighthouse keepers and lamplighters, and nonappropriated fund employees.
- B. <u>Authorities The Office of Personnel Management (OPM)</u>. OPM has final authority over determining position coverage or exclusion under the systems, position classification standards, and system administration.
- C. <u>Responsibilities</u>. Commandant Instruction 12250.1 (series), Delegation of Civilian Personnel Authorities, delegates personnel management authority with the intention of exercising them only on the advice of qualified civilian personnel specialists. Civilian personnel specialists who are delegated this specific function will classify positions.
 - 1. Personnel offices and specialists delegated classification authority are responsible for:
 - a. Evaluating positions and wage jobs to determine authorized title, series, and grade;
 - b. Advising supervisors in developing position and job descriptions and assisting where necessary;
 - c. Specifying the format used to write position and job descriptions;
 - d. Interpreting position classification and job grading standards and criteria in the classification process as requested by employees or supervisors;

- e. Assisting managers in the classification determinations they make as part of advisory boards, subject matter panels, or delegated classification authorities;
- f. Reviewing current position descriptions and classifications with supervisors to ensure accuracy; and
- g. Advising managers and supervisors on position management concepts such as exercising grade control, restructuring jobs, and optimally using skills.

2. Supervisors are responsible for:

- a. Developing organizations, planning and assigning work to individual positions within personnel and funding limitations;
- b. Reviewing and approving official position descriptions on an ongoing basis to ensure accuracy and currency;
- c. Ensuring that employees fully understand the duties, responsibilities, and other factors in their job descriptions;
- d. Participating in and exercising classification authority as part of an advisory board, subject matter panel, or delegated classification authority;
- e. Providing recurring funds to cover upgrading costs, except for upgrades due to: (1) classification appeals; (2) new classification standards; and (3) authorized occupational reviews; and
- f. The supervisor of the unit under A-76 review shall contact the civilian personnel office to obtain a determination of the pay plan, title, series, and grade of all positions in the study as well as the proposed support structure if the function is contracted out.

3. Employees are responsible for:

- a. Ensuring they understand the intent and content of their assigned duties and responsibilities; and
- b. Participating in a periodic review with the supervisor to verify the accuracy of the position description.

D. <u>Coast Guard Career Ladders</u>. Due to the large number of Occupational Reviews which have been conducted, career ladders for Coast Guard occupational series are provided in enclosure (1). A given occupational series may indicate multiple career ladders such as 11/12, which reflects that an incumbent may progress to either the 11 or 12 grade level in that occupation. Exceptions to these career ladders may reflect unique local operating circumstances. The career ladders will be updated in the future as occupational reviews are concluded or on a personnel office request.

CHAPTER 2. POSITION CLASSIFICATION

- A. <u>General</u>. Classifying a position is based on the type and difficulty of the duties, responsibilities, skills requirements, and degree of supervision exercised over and by the incumbent.
 - 1. Preparation. Position descriptions may be prepared by:
 - a. Supervisors or other program officials familiar with the work and relationships to other positions; or
 - b. Personnel specialists, who may assist supervisors based on their knowledge and information about the work.
 - 2. <u>Approval</u>. The supervisor is responsible for the final approval of the document and must attest to its accuracy.

B. Position Description Content.

- 1. <u>Required Format</u>. All positions require a completed Optional Form (OF-8). White-collar positions are developed using the format specified in the applicable grade level standard. Blue-collar positions use the Federal Wage System format.
- 2. <u>Standard of Adequacy</u>. A position description is adequate if the principal duties, responsibilities, supervisory relationships, and other factors it describes, provide enough information to classify a position under these conditions:
 - a. A person who is familiar with the occupational fields and pertinent classification standards reads it; and
 - b. It contains current information on the organization, functions, programs, and procedures.
- 3. <u>Supervisory Certification Statement</u>. The supervisory certification statement in Block 20a of the OF-8 must be signed by the immediate supervisor. The higher level supervisor's signature in Block 20b is optional.

- 4. <u>Supervisory Positions</u>. Supervisory position descriptions must describe assigned administrative or management duties and responsibilities in addition to any technical or program management functions. The descriptions must contain a statement of responsibility to ensure the effective administration of an organization's Equal Employment Opportunity (EEO) Program under his or her supervision.
- 5. <u>Collateral Duties of Employees Involved in the EEO</u> Program. The position description must document collateral EEO duties and responsibilities. The collateral duty statements must be used to identify EEO Counselor and Special Emphasis Program (Federal Women, Hispanic) Coordinator collateral duties occupying less than 25 percent of time.
- 6. <u>Amendments</u>. When the duties, responsibilities, or working relationships of an existing position have changed, but not extensively enough to effect the position classification, the supervisor can amend the position description. The supervisor and personnel specialist must sign an amendment, which when classified, becomes a part of the official position description.
- 7. <u>Statements of Difference</u>. Where a complete position description and evaluation statement are prepared for the full performance level in a career ladder position, and the intermediate grade level in the posttion's career ladder progression is identified, a statement of difference may be used in lieu of a complete position description for the intermediate grade level.
- 8. <u>Position Sensitivity and Risk Level Designation</u>. Supervisors and managers are required to determine the initial position risk level. They should send recommendations for an initial designation or changes to a sensitive position with, a copy of the position description, to the Personnel Security Officer, Commandant (G-OIS-2), for a final determination. The personnel office shall maintain a listing of approved sensitivity and risk level designations.
- 9. <u>Drug Testing Designation</u>. A coverage determination will be made on all positions for the drug testing program. The remarks section of the OF-8 must be annotated with one of these comments: (1) Category I position (subject to random drug testing procedures); or (2) Category II position (not

subject to random drug testing procedures). DOT order 3910.(Series), "DOT Drug Free Departmental Workplace," contains a list of Category I positions. Commandant (G-PCV) must agree to include or exclude positions from either Category I or Category II. In requesting this concurrence, drug testing program officials must provide a justifying statement clearly describing why the job is safety/security critical and specifying the likely adverse consequences if an incumbent were to use illegal drugs.

- 10. <u>Drug and Alcohol Testing Designation</u>. All positions requiring a commercial driver's license (CDL), as designated by the Drug and Alcohol program coordinator, are subject to the Drug and Alcohol testing program. The Optional Form 8 (OF-8) remarks section must indicate: (1) Category I position (subject to random drug and alcohol procedures); and (2) Incumbent must possess a valid commercial driver's license.
- C. <u>Evaluation Statements</u>. A written evaluation statement analyzes the duties and responsibilities and compares them to classification criteria. The personnel specialist prepares and signs the evaluation statement. Except for a classification appeal, which requires an evaluation statement, the servicing personnel office may decide the need for a written evaluation statement. Typical situations which may warrant developing a written evaluation statement include: positions having no published standards; supervisory positions; General Schedule positions reflecting an accretion of duties; mixed positions (representing two or more different duties classifiable to different grade levels); the full performance level in a career ladder position; non-standard position descriptions GS-12 and above;, positions that do not meet the grade level management requests; positions classified using the Primary Standard; those classified by extrapolation; and, Federal Wage System jobs at or above the journeyman level.
 - 1. General Information. Prepared evaluation statements should contain this information.
 - a. <u>Position Identification</u>. The title, series, grade, organizational designation, and geographical location (city and state).
 - b. <u>Nature of the Action</u>. Whether the action upgrades, redescribes at same grade, creates a new position, converts to a different pay plan, etc.
 - c. <u>Background</u>. Identify previous

position description and/or amendments, addition of functions causing position redescription, or any information that might assist in evaluating the position.

- d. Evaluation Statement. Give the basis for:
 - (1) Selecting and assigning the series.
 - (2) Determining grade level, for example:
 - (a) Skill and knowledge;
 - (b) Supervisory controls;
 - (c) Work complexity; and/or
 - (d) Physical effort.
- 2. <u>Supervisory Positions</u>. A personnel specialist must evaluate General Schedule and Federal Wage supervisory positions using the factors outlined in their respective standards. A form evaluation may be used if it addresses all relevant issues.

CHAPTER 3. CLASSIFICATION APPEALS

- A. <u>Coverage</u>. This appeal procedure covers these positions.
 - 1. <u>General Schedule</u>. Commandant (G-PCV) adjudicates and decides classification appeals. Further appeals from Commandant (G-PCV) adjudications must go to OPM for General Schedule and Federal Wage Schedule positions. By appealing directly to OPM, an employee waives the right to appeal the same classification decision in the Coast Guard.
 - 2. Administrative Law Judges and positions classified by or at the direction of OPM must appeal directly to OPM.
 - 3. <u>Federal Wage System</u>. A Federal Wage System employee must appeal first to the Coast Guard. The employee may file an appeal with OPM after receiving the Coast Guard's decision within 15 calendar days.
- B. <u>Civilian Personnel Office Review</u>. The civilian personnel office must review all appeal requests to ensure classification actions, which they may implement, are addressed at the operating personnel office level rather than unnecessarily referred for appeal adjudication. After the civilian personnel office review, the employee may appeal any further classification issues.
- C. <u>Appealable/Non-Appealable Items</u>. An employee has the right to appeal the classification of his or her position description. However, these actions are not subject to appeal: including or excluding of a major duty; classifying a position which is not the employee's permanent position of record; classifying a position by comparing it to other positions; or the rate of pay of propriety of a wage schedule for Federal Wage System employees.
- D. <u>Retroactive Classification Benefits</u>. Promptly filing an appeal may allow retroactive classification benefits in cases of wrongful demotion. An appeal decision which wholly or partly reverses a classification that results in losing grade or pay may apply retroactively if the employee:
 - 1. Files the initial appeal with the appropriate office within 15 calendar days after the effective date of the action taken by Coast Guard; and
 - 2. Files a further appeal, if the action is appealed to the next appeal level, within 15 calendar

- days after the employee receives the Coast Guard decision.
- 3. If it is found the employee was not notified of these limits or there were extenuating circumstances, Commandant (G-PCV) or OPM may extend the time limits specified above for determinations under their authority.
- E. <u>Employee Representative</u>. An employee has the right to be represented in a classification appeal by a representative of their choice.
 - 1. Employees and their representatives are allowed a reasonable amount of official time to present the appeal.
 - 2. An employee may not choose as a representative a supervisor with line authority over the position or an agency official with classification authority over the position.
 - 3. A representative may submit any information about position classification, but does not have the right to be present during any fact-finding sessions (e.g., desk audit, supervisory interviews).
- F. <u>Contents of an Appeal</u>. An employee appeal to the Coast Guard or OPM must be in writing and include this information:
 - 1. Employee's name, mailing address, and office phone number;
 - 2. Exact location of the employee's position in the organizational structure (Administration, Office, Division, Branch, etc.);
 - 3. Employee's current title, series, and grade;
 - 4. Requested title, series, grade, or other classification action;
 - 5. A copy of the employee's official position description and a statement that the employee agrees with the official description. If the employee believes the description is not accurate, then he or she must provide specific written documentation about the disagreement and what steps have been taken to change or modify the official description. (Disagreements about content or verbiage do not constitute a basis for an appeal. The employee should resolve them with the appropriate supervisors or, as a last resort, through the appropriate grievance procedure.);

- 6. Why the employee believes the position is erroneously classified. If possible, the employee should refer to classification standards and address specific areas of disagreement with the current evaluation statement. Federal Wage System employees who appeal to OPM must identify the specific portion(s) of the Coast Guard appeal decision they disagree with; and
- 7. Name, address, and business telephone number of the employee's representative, if selected.
- G. Appeal Processing. Upon receiving a classification appeal, Commandant (G-PCV) will:
 - 1. Promptly record and acknowledge receiving the appeal;
 - 2. Inform the employee in writing upon sending the appeal to OPM;
 - 3. Establish an official position classification file separate from the Official Personnel Folder. (This file shall not contain any document or information the employee has not been given the opportunity to review.);
 - 4. Investigate each posttton's classification to ascertain if the employee performs regularly assigned principal duties and responsibilities. The immediate supervisor also must certify position management;
 - 5. When necessary, request the employee or personnel office furnish additional information. Commandant (G-PCV) will adjudicate appeals on the basis of information contained in the record. The deciding official will conduct on-site reviews at his or her discretion;
 - 6. Issue a written decision to the appellant, generally by 60 work days after receiving the materials pertinent to the appeal. This decision will inform the employee of the reasons for the decision, including an analysis of the position classification comparing it to the appropriate standards; and
 - 7. Specify the effective date of any classification changes resulting from the decision and inform the employee of further appeal rights and applicable time limits.

H. Cancellation of Appeals.

- 1. Commandant (G-PCV) will cancel an employee's appeal:
 - a. At his or her request when the employee is no longer officially in the position unless there is a possibility of retroactive benefits; or
 - b. If the employee or his or her representative fails to furnish requested information needed to process the appeal promptly.
- 2. A cancelled appeal will not be reopened unless the employee is able to show extenuating circumstances existed.
- I. <u>Effect of Appeal Decision</u>. The Commandant's (G-PCV) classification appeal decision represents the Department of Transportation's (DOT) final decision. Commandant (G-PCV) decisions constitute a binding, mandatory certificate on personnel and personnel officers. Only Commandant (G-PCV) may reopen and reconsider any decision when the action appears warranted. OPM will review Commandant (G-PCV) appeal decisions should eligible employees (General Schedule and Federal Wage System) choose to file a further appeal with OPM.
- J. <u>Mandatory General Schedule Appeal Referrals</u>. The employee's appeal must be sent to OPM as soon as possible if Commandant (G-PCV) does not have the authority to act on the appeal.
 - 1. The appeal may be sent to OPM with the appellant's approval within 30 calendar days of its receipt if Commandant (G-PCV) elects to have OPM decide it.
 - 2. The appeal must be sent to OPM within 60 calendar days of its receipt when the employee addressed the appeal to OPM through Commandant (G-PCV), when Commandant (G-PCV) has not rendered a decision.
 - 3. Commandant (G-PCV) will notify the employee of the plan to send an appeal to OPM and request written concurrence from the employee. The appeal will be cancelled if the employee does not want it sent to OPM.

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